

# **Exhibit B**

**From:** Disher, Todd  
**To:** "Nina Perales"; Bitter, Adam; Peroyea, Trent  
**Cc:** Aaron.Goldsmith@usdoj.gov; Rachel Wainer Apter; Kenneth Levine; Celina Moreno; Ernest Herrera; Alejandra Avila; Hallward-Driemeier, Douglas H.; Jeremy Hollander (Jeremy.Hollander@law.njoag.gov); Denise M. Hulett; Starr, Brantley; Biggs, Adam  
**Subject:** RE: USCIS deposition  
**Date:** Wednesday, July 11, 2018 9:55:00 AM

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Nina,

Are you going to seek leave from the Court to take this deposition as required by paragraph 3 of the July 2 Order? Please do so immediately so that all parties have a chance to arrange travel if needed. Also, in addition to the Court's instruction of indicating with specificity why this desired testimony is helpful and not covered by Defendants' interrogatory answers, please explain why Defendant-Intervenors should be allowed to elicit sworn testimony from someone who was not included on their witness list that the parties agreed to exchange on June 8.

Todd

**Todd Lawrence Disher**

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**From:** Nina Perales [mailto:[nperales@MALDEF.org](mailto:nperales@MALDEF.org)]  
**Sent:** Tuesday, July 10, 2018 6:03 PM  
**To:** Disher, Todd <[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)>; Bitter, Adam <[Adam.Bitter@oag.texas.gov](mailto:Adam.Bitter@oag.texas.gov)>; Peroyea, Trent <[Trent.Peroyea@oag.texas.gov](mailto:Trent.Peroyea@oag.texas.gov)>  
**Cc:** Aaron.Goldsmith@usdoj.gov; Rachel Wainer Apter <[Rachel.Apter@njoag.gov](mailto:Rachel.Apter@njoag.gov)>; Kenneth Levine <[Kenneth.Levine@law.njoag.gov](mailto:Kenneth.Levine@law.njoag.gov)>; Celina Moreno <[cmoreno@MALDEF.org](mailto:cmoreno@MALDEF.org)>; Ernest Herrera <[eherrera@MALDEF.org](mailto:eherrera@MALDEF.org)>; Alejandra Avila <[Aavila@MALDEF.org](mailto:Aavila@MALDEF.org)>; Hallward-Driemeier, Douglas H. <[Douglas.Hallward-Driemeier@ropesgray.com](mailto:Douglas.Hallward-Driemeier@ropesgray.com)>; Jeremy Hollander <[Jeremy.Hollander@law.njoag.gov](mailto:Jeremy.Hollander@law.njoag.gov)>; Denise M. Hulett <[Dhulett@MALDEF.org](mailto:Dhulett@MALDEF.org)>  
**Subject:** USCIS deposition

Dear Counsel,

Please find attached a subpoena the Perez Defendant Intervenors served today on Michael Knowles, President of the National Citizenship and Immigration Council of the AFGE, AFL-CIO. The deposition of Mr. Knowles is scheduled for Friday, July 13, 2018 at 11:30am in Washington DC.

Thank you,

Nina Perales  
Vice President of Litigation  
Mexican American Legal Defense  
and Educational Fund, Inc. (MALDEF)  
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